

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-  
MKM (consolidated)

Hon. Judith E. Levy  
Mag. Mona K. Majzoub

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Applicable to All Cases

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VEOLIA WATER NORTH AMERICA OPERATING SERVICES, LLC,'s  
VEOLIA NORTH AMERICA, LLC's, AND VEOLIA NORTH AMERICA,  
INC.'s DISCLOSURE PURSUANT TO DISCOVERY COORDINATION  
PROTOCOL ORDER (Dkt. 566) SECTION IV.E

The defendants Veolia Water North America Operating Services, LLC, Veolia North America, LLC, and Veolia North America, Inc. (the "VNA defendants") provide the following information concerning responses they have received to interrogatories or document requests they served in any case included within the definitions of Federal Flint Water Cases or State Flint Water Cases contained in the Discovery Coordination Protocol Order (Dkt. 566) entered on August 17, 2018.

1. The VNA defendants have not taken or participated in any depositions in proceedings falling within the definitions of Federal Flint Water Cases or State Flint Water Cases contained in the Discovery Coordination Protocol Order. The VNA defendants have not noticed any depositions in any such cases and are not aware of any such depositions noticed by others that have not yet been taken.

2. The VNA defendants have not yet served any interrogatories in any action falling within the definitions of Federal Flint Water Cases or State Flint Water Cases contained in §§II.A. and II.B of the Discovery Coordination Protocol Order.

3. The VNA defendants served their First Request for Production of Documents and Tangible Things by the Plaintiffs on the named plaintiffs in *Elnora Carthan et al. v. Governor Rick Snyder et al.*, Civil Action No. 5:16-cv-10444-JEL-MKM on January 15, 2018. The *Carthan* plaintiffs served their written response on February 19, 2018, and the documents tendered in the response were produced electronically that same day. None of the documents produced is subject to a confidentiality order.

4. An accurate copy of Class Plaintiffs' Response to Veolia Water North America Operating Services, LLC's, Veolia North America, LLC's, and Veolia North America, Inc.'s First Request for Production of Documents is attached as Exhibit A to this filing.

5. The VNA defendants have participated with other parties in the service of four documents-only subpoenas in *In re Flint Water Cases*, Civil Action No. 5:16-cv-10444-JEL-MKM. No documents responsive to those subpoenas have yet been received by the VNA defendants.

*Respectfully submitted,*

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Dated: August 28, 2018

CERTIFICATE OF SERVICE

I, John A. K. Grunert, one of the counsel of record for the defendants Veolia Water North America Operating Services, LLC, Veolia North America, LLC, and Veolia North America, Inc., certify that on August 28, 2018, I caused the within disclosure to be filed electronically with the Clerk of Courts through the Court's ECF filing system which will cause it to be served automatically by electronic means to counsel of record for all parties.

/s/ John A. K. Grunert  
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